view of Baker-Bachman as applied to Claims 1-2 above, and further in view of U.S. Patent Number 5,755,021 to Beakes et al. (Beakes).

Applicant respectfully traverses the rejections for at least the following reason(s).

Claims 1-4 each recite, among other features, a channel or through hole being defined in a bobbin and having one end facing an end of the connecting plate portion of a connecting terminal and a diameter larger than a diameter of a fitting hole wherein one electrode of a pair of electrodes extends into the channel or through hole. See Figures 6 and 9 of the application as originally filed for exemplary embodiments of the above-noted feature(s) of the claimed invention. In particular, each figure clearly shows the diameter of the channel or through hole into which the electrode extends is larger than the fitting hole located to right of the channel or through hole.

Applicant respectfully points out that at no point do any of the claims recite using an electrode or the pair of electrodes to fuse the connecting terminals.

Applicant respectfully submits that despite what is stated in the Office Action, none of the applied art of record teach or remotely suggest the above-noted feature(s) of the claimed invention.

For example, the Office Action states that Figures 3 and 8A-D of Kakinuma teaches a diameter larger than a diameter of a fitting hole wherein one electrode of a pair of electrodes extends into a channel or through hole. See page 4, lines 4-6 of the Office Action. Yet, the Office Action then states that

Kakinuma does not disclose a bobbin having two holes of channels wherein one of the channels may be used to insert an electrode.

Despite and regardless of the rather confusing statements contained in the Office Action regarding Kakinuma, Applicant again notes that Kakinuma plainly and unambiguously teaches a single hole, channel or aperture (30) in which a terminal member (25) is received. Kakinuma absolutely does not teach or suggest a second hole, channel or aperture defined in the bobbin, let alone a second aperture that has a larger diameter than a diameter of the fitting tube (30) into which an electrode extends.

Figures 3 and 8A-D are totally silent as to an electrode extending into the fitting tube (30). As such, the Office Action referencing Figures 3 and 8A-D of Kakinuma as somehow teaching features that correspond to a channel or through hole being defined in a bobbin and having one end facing an end of the connecting plate portion of a connecting terminal and a diameter larger than a diameter of a fitting hole wherein one electrode of a pair of electrodes extends into the channel or through hole is confusing.

Put simply, Applicant respectfully submits that Kakinuma completely fails to teach or suggest an electrode extending into any portion of the bobbin (18) taught therein.

In any subsequent communication from the Office in which a contrary position is asserted, that is, that Kakinuma teaches an electrode actually extending into some portion of the bobbin (18), Applicant respectfully requests

that the Office identify, with particularity, exactly where in Kakinuma such an electrode is disclosed.

Figures 10A and 10B of Terakado merely show two electrodes (33) and (34) that are used to press a wire bundling terminal (12) and apply an electric current thereto. Terakado is not cited for and does not stand for the proposition that the reference teaches an electrode extending into a channel or through hole defined in a bobbin. Put simply, Terakado does not cure or otherwise address the above-noted deficiencies of Kakinuma with respect to an electrode extending into a channel or through hole defined in a bobbin. While Terakado teaches the use of electrodes in a manufacturing process, Applicant notes that Terakado totally lacks any teaching or suggestion of having an electrode extend into a channel or through holed defined in a bobbin as a structural feature of the connection structure taught therein.

The Office Action then takes a totally unsubstantiated and completely erroneous position and states "Kikuchi et al teaches a bobbin having two holes wherein one can be used to insert an electrode to fuse connecting terminals. Kikuchi et al do not explicitly teach the use of two electrodes for fusing the terminals." See page 4, lines 9-11 of the Office Action.

Applicant respectfully points out, again, that nowhere in the claims is there a recitation that an electrode fuses the connecting terminals. The Office Action admitting that Kikuchi does not teach the use of two electrodes for fusing the terminals is irrelevant to the issue of Claim 1 being patentable over Kakinuma, Kikuchi and Terakado.

Rather, the issue that should be considered by the Office is whether any of the references (Kakinuma, Kikuchi, Terakado, and others) teach or at least suggest an electrode extending into a channel or hole defined in a bobbin because that is the structural feature that is actually recited by Claim 1.

Applicant again respectfully submits that the issue of Kakinuma, Kikuchi and Terakado teaching the use of an electrode to fuse terminals is irrelevant to the question of patentability of Claim 1.

Applicant has carefully examined Kikichi and is unable to locate one instance where the word "electrode" is even used. The Office Action stating a position that Kikichi teaches a plurality of holes, one of which "may be used to insert an electrode," is speculative at best and unsupported by the actual teachings of Kikuchi. Applicant notes that Kikuchi clearly teaches that a coupler (46_1) is inserted into the recess (38) between the bores (35_1) and (35_2), as shown in Figure 4, wherein an external conductor (47_1) is connected to the coupler (46_1).

The Office Action has not provided any basis upon which one of ordinary skill in the art would deem it obvious to modify the asserted Kakinuma, Kikuchi, Terakado combination wherein one of the multiple bores defined in a bobbin has an electrode extending therein, especially in view of the fact that not one of Kakinuma, Kikuchi and Terakado teaches or remotely suggest such a feature.

Further, Applicant notes that in Section 8 of the Office Action titled "Response to Argument," the Examiner alleges that in the Response dated January 9, 2008, the Applicant argued that the cited art does not teach

electrodes to be used for fusing the terminals. Applicant respectfully, but forcefully, submits that at no point whatsoever in the January 9 Response was such an argument asserted. Rather, Applicant consistently and clearly asserted that the applied art of record fails to teach or suggest the concept of an electrode extending into any portion of a bobbin. See page 6, lines 13-15 of the January 9 Response with respect to Kakinuma and page 7, lines 9-11 of the January 9 Response with respect to Kikuchi, wherein at no point did Applicant even mention the intended use of the electrodes.

Applicant respectfully reminds the Office that Claim 1 is an apparatus or device claim, therefore the manufacturing process and intended use of the invention recited therein is provided little (if any) patentable weight. Rather, it is the recited structural features that are given patentable weight.

Put simply, Kikuchi and Terakado, like Kakinuma, fail to teach or suggest a bobbin having an aperture, hole or channel defined therein into which an electrode extends. As such, Applicant respectfully submits that Kikuchi and Terakado fail to cure the above-described deficiency of Kakinuma and one of ordinary skill in the art would not deem it obvious to modify Kakinuma according to the teachings of Kikuchi and/or Terakado because to do so would not arrive at the invention recited by Claims 1-4.

Baker-Bachman is applied for teaching terminals having different geometric shapes. As such, Applicant respectfully submits that Baker-Bachman fails to cure the above-described deficiencies of Kakinuma, Kikuchi and Terakado.

Beakes is applied for teaching it is known to cut off the unwanted portions of a lead wire. As such, Applicant respectfully submits that Beakes fails to cure the above-described deficiencies of Kakinuma, Kikuchi, Terakado and Baker-Bachman.

Applicant also notes that Claim 1 further recites a flat connecting plate portion having one end thereof connected ***at right angles*** to the other end of the external conductor connection terminal portion and ***extending toward a radial inner side of the stator***. Figures 5-7 and 9 of the application illustrate exemplary embodiments of the right-angled bent plate portion. It should be noted that when mounted, the right-angled bent plate portion extends toward a radially inner side of the stator. The bent plate portion is not on the same plane as of the connecting terminal portion.

The corresponding elements shown in Figures 8A-8D and 9 of Kakinuma do not have such a right-angled bent plate portion. Even if portion 25b of elements 25_1-25_{10} are considered as corresponding to the claimed invention, the portion 25b is on the same plane as the portions 25a and 25c. As such, it is clear that the direction in which the elements 25_1-25_{10} extend in Kakinuma is totally different from that of the connecting terminal of the claimed invention.

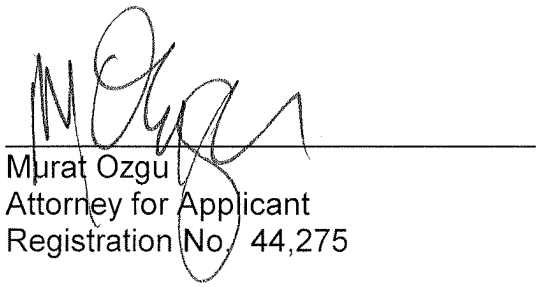
For the above provided reasons, Applicant respectfully submits that the applied art of record fails to teach or suggest the features recited by Claims 1-4, that Claims 1-4 are not rendered obvious in view of the teachings of the applied art of record, that Claims 1-4 should be deemed allowable over the applied art of record, and that the rejections of Claims 1-4 should be withdrawn.

In view of the above, reconsideration of the application, withdrawal of the outstanding rejections, allowance of Claims 1-4, and the prompt issuance of a Notice of Allowance is respectfully requested.

Should the Examiner believe anything further is desirable in order to place this application in better condition for allowance, the Examiner is requested to contact the undersigned at the telephone number listed below.

In the event this paper is not considered to be timely filed, the Applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension, together with any additional fees that may be due with respect to this paper, may be charged to counsel's Deposit Account No. 01-2300, **referencing docket number 107348.00474**.

Respectfully submitted,
ARENT FOX LLP



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